

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL GORDON DOUGLAS,

Defendant.

Case No.: 23-CR-80219-AMC

**GOVERNMENT’S REQUEST FOR SPECIFIC  
VOIR DIRE QUESTIONS TO THE JURY  
PANEL**

The United States of America files this request for specific questions to the jury panel pursuant to Fed. R. Crim. P. 24(a). Accordingly, the government requests that the Court ask the following questions of the jury panel:

1. Is there anyone who does not have any internet access?
  - i. If so, for how long?
2. Is there anyone who has never conducted a search on the internet for anything?
3. Would anyone consider themselves to be a computer expert? If yes,
  - i. In what ways do you consider yourself an expert?
  - ii. Have you had some type of formal computer training and what kind?
4. We understand that some of these topics might be very sensitive and personal for some people, so if anyone doesn’t feel comfortable answering in front of the group, please feel free to let us know, and we can discuss it in private. By a show of hands, does anyone know anyone, including yourself, that was accused of a sex crime?
  - i. Who did you know?
  - ii. Did you learn any of the facts?
  - iii. Do you think they were treated fairly by law enforcement?

5. As the Court explained, some of the evidence in this case will be videos and images, which the United States alleges constitute child pornography. These images may be distasteful, offensive, and unpleasant to view. However, the prospect of having to see distasteful, offensive or unpleasant evidence is not a basis to avoid the responsibility of jury service. Many cases involve unpleasant things. If we excused jurors on the ground that jury duty makes demands - including some unpleasant demands - then we could not function. Moreover, the parties have the right to expect that jurors will not seek to avoid jury service simply because they would rather not serve, or because they would like to avoid some unpleasantness. Having said that,

- i. Is there anyone who honestly believes there is some compelling reason why he or she could not be an impartial juror - that is to consider all the evidence and follow the law - simply because images allegedly depicting child pornography will be presented as evidence in the trial?
- ii. Does anyone have any opinions, religious beliefs, philosophies, or prejudices which would make you unable to come to a verdict in this case? For example, do you believe that no person should ever be judged or convicted by another person?

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES**

I hereby certify that I have communicated the instant notice with counsel for the Defendant, Scott Berry, via email, who responded that they agree with the Court inquiring of the jurors of these questions.

Respectfully submitted,

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

By: /s/ Justin Chapman  
JUSTIN CHAPMAN  
ASSISTANT UNITED STATES ATTORNEY  
Fla. Bar No. 85778  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 28, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Justin Chapman  
JUSTIN CHAPMAN  
Assistant United States Attorney